

# EXHIBIT E

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOHN F. VODOPIA,	)	CASE NO. 1:07CV06214
	)	
Plaintiff,	)	JUDGE BARBARA S. JONES
	)	
vs.	)	MAGISTRATE JUDGE DEBRA C. FREEMAN
	)	
KONINKLIJKE PHILIPS ELECTRONICS	)	
N.V., <i>et al.</i> ,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF WARREN T. OATES, JR. IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS COMPLAINT OF JOHN F. VODOPIA**

I, Warren T. Oates, Jr. do hereby swear and depose as follows:

1. I make this Affidavit based on my own personal knowledge and in support of the Motions to Dismiss of Koninklijke Philips Electronics N.V. ("Koninklijke") and Philips Electronics North America Corporation ("Philips").

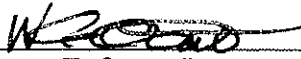
2. I have been employed by Philips since May 1991. I currently hold the title of Senior Assistant Corporate Secretary and Director, Legal Administration. I have been responsible for corporate, secretarial, and administrative duties. In this capacity, I have an understanding of the corporate structure of Philips and Koninklijke.

3. Philips is not a publicly traded company or a company with a class of securities registered under section 12 of the Securities Exchange Act of 1934 (15 U.S.C. § 781) or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. § 78o(d)). An entity called Philips Holding USA Inc. ("Philips

Holding”) owns one-hundred percent (100%) of the shares of Philips. Philips Holding is not a publicly traded company or a company with a class of securities registered under section 12 of the Securities Exchange Act of 1934 (15 U.S.C. § 781) or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. § 78o(d)).

4. Koninklijke is a Dutch Corporation with its principal place of business in Amsterdam, the Netherlands. Koninklijke does not have a place of business in New York or elsewhere in the United States.

FURTHER AFFIANT SAYETH NAUGHT.

  
Warren T. Oates, Jr.

Sworn to before me and subscribed in my presence this 18th day of September, 2007.

Notary Public



JOAN TAYLOR  
Notary Public, State of New York  
No. 01TA6076179  
Qualified in Nassau County  
Certificate Filed in New York County  
Commission Expires June 24, 2010